

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:19cr130
)	
OKELLO T. CHATRIE,)	
Defendant)	

**DEFENDANT’S CONSENT MOTION TO EXTEND SUPPLEMENTAL BRIEFING ON
GEOFENCE MOTION TO SUPPRESS BY ONE WEEK**

Okello Chatrie, through counsel, moves the Court to extend by one week the deadline for the supplemental briefing of the Geofence Motion to Suppress. In support of this motion, Mr. Chatrie states the following:

1. On April 10, 2020, Mr. Chatrie filed a Notice of Satisfaction of Requests in Geofence Discovery Motion. *See* ECF No. 99. In that Notice, Mr. Chatrie asked the Court for an opportunity to supplement his Geofence Motion to Suppress to aid the Court’s preparation for the evidentiary hearing on that motion scheduled now for July 2, 2020. *Id.* at 2. The Court granted that request and consistent with the date undersigned counsel had suggested as appropriate for that supplemental filing, the Court ordered that Mr. Chatrie submit his supplemental briefing by May 15, 2020. *See* ECF No. 101 at 3.
2. Since Mr. Chatrie filed the Notice described above in ECF No. 99 on April 10, 2020, two events have occurred that have delayed the defense’s preparation of the supplement. First, Mr. Price’s wife gave birth to a healthy baby in New York City, New York—which is the epicenter in the United States of the COVID-19 pandemic. While certainly a joyous occasion, giving birth in the epicenter of a global pandemic came along with extra

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